



Law Office of Kristopher E. Twomey, P.C.
Telecom/Internet Law & Regulatory Consulting

Kristopher E. Twomey
Andrew M. Ganz
attorneys admitted in
DC, MA, and CA

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: VoIP E911 Compliance Letter on behalf of Aero Group;
WC Docket No. 05-196

Dear Ms. Dortch:

Aero Group submits this Compliance Letter ("Letter") to advise the Commission of the status of Aero Group's efforts to comply with the Commission's enhanced 911 ("E911") service requirements and conditions applicable to interconnected Voice over Internet Protocol ("VoIP") service providers as established in the IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers, First Report and Order and Notice of Proposed Rulemaking. ("VoIP E911 Order") As required by the Commission's rules, and consistent with the Public Notice issued by the Enforcement Bureau on November 7, 2005 (the "Public Notice"), this Letter details Aero Group's efforts to provide E911 service to customers in compliance with Commission directives. Aero can be contacted at:

Aero Group, Inc.
216 E Stephenson St.
Freeport, IL 61032
888-275-2376
815-233-3387

Aero's website can be accessed at www.aeroinc.net.

911 Solution

The Aero Group, Inc. (in document will be referred to as "AG") is currently deploying VoIP services to the following NPA-NXXs and the communities which are attached to this document as Appendix A. AG has a current customer base of 929 which encompass the communities and NPA-NXXs in Appendix A. AG is currently providing Enhanced 911 to the NPA-NXXs and the communities which are attached to this document in Appendix B. AG will be compliant with FCC ruling for E-911 for the customers in the communities and NPA-NXX's in Appendix B. The Aero Group has 807 customers in this region who have access to 911, representing 87% of its customer base. AG will not be compliant in other region in the United States of America.

1519 E. 14th Street, Suite A
San Leandro, CA 94577
Phone: 510 903-1304
Fax: 510 868-8418
Email: kris@lokt.net

1725 I Street, NW, Suite 300
Washington, DC 20006
Phone: 202 250-3413
Fax: 202 517-9175
www.lokt.net

911 Routing Information/Connectivity to Wireline Network

AG is currently delivering Enhanced 911 via the 911 Verizon selective router in Dekalb, IL to the 911 centers for Stephenson County and Ogle County and the communities which lie within are on the Appendix B document.

Transmission of ANI and Registered Location Information

E911 calls from AG's E911-capable customers provide full ANI and registered location information to emergency personnel.

911 Coverage

AG began taking steps to provide E-911 to other regions in June of 2005 by hiring Intrado, Inc. as its underlying carrier. In a conversation with Intrado on November 7, 2005, AG was informed that Intrado would not be able to deliver E-911 to the entire country. AG is not depending on Intrado to deliver E-911 to communities in Appendix C and has taken steps to order trunks to Selective Routers in Winnebago County and Jo Davies County for the customers in Appendix C.

AG has most recently tried to work with SBC as they are the incumbent in the LATA and has had conversations over the last month with Jane McMurray of SBC and Donna Larabie of SBC who work with the City of Rockford, IL and Winnebago County for SBC. AG has been told by both entities that AG can not accomplish this through them, and has also worked with Georgeann Dahm who is the Division Administrator for the City of Rockford. Along with these attempts, AG is currently working on an interconnection agreement via its affiliated competitive local exchange carrier "Aero Communications, LLC." That process is in the final stages and the agreement should be complete by December 31, 2005. After this occurs, AG will have access to Aero Communications' trunks directly connected to the selective routers in Winnebago and JoDavies County.

AG is committed to providing E-911 and will continue to work closely with Intrado and Aero Communications to resolve all remaining E-911 issues and will work with the incumbent local providers to find solutions for E-911 for current customer areas not yet covered, currently approximately 13% of the embedded base.

Obtaining Initial Registered Location Information

During the process of signing up for VoIP service, the customer does read a document receive a copy of a letter detailing where E-911 is available and where it is not. The customer must initial the sign up form acknowledging that they have read the document. This document is filed into a customer file notating they have been made aware of 911 availability.

The adapter they are using is not nomadic and the telephone adapter is notated with a sticker. We have also communicated with our customers that their device is not nomadic via a letter sent and dated October 1, 2005.

Ms. Marlene Dortch
Page 3
November 28, 2005

Obtaining Updated Registered Location Information

Currently Aero offers its customers the ability to update us with address changes via 2 methods listed below:

- 1.) Call in to AG via 1-888-275-2376 or 1-815-233-3387 to inform of address change.
- 2.) Go to the website <http://www.aeroinc.net> and select the VoIP icon where on the homepage they have the ability to update a change of address.

These are the 2 methods that a customer can currently notify AG of and address change. These customers are notified as stated earlier that these devices are not intended for nomadic use as AG does not provide E-911 in any other parts of the country.

If additional information is needed, please contact me, or AG directly by calling Adam Schulz at 815 233-3887.

Sincerely,



Kristopher E. Twomey
Regulatory Counsel

Enclosures

cc: Byron McCoy (FCC) byron.mccoy@fcc.gov
 Kathy Berthot (FCC) kathy.berthot@fcc.gov
 Janice Myles (FCC) janice.myles@fcc.gov
 Best Copy and Printing, Inc. fcc@bcpiweb.com